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07/08/2005 10:40 AM

To: Christopher Lichens/R9/USEPA/US@EPA,
cmclaugh@demaximis.com
cc: Frederick Schauffler/R9/USEPA/US@EPA,
tom.perina@ch2m.com, "Eisenbeis, John"
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bcc

Subject: RE: EE/CA Alternative 2 treated water

Chris - thanks for your very timely response on this issue.

We concur that Alt 2 will specify surface discharge as the intended disposition for the extracted and treated groundwater. What would you think about the following text to be added right after that description:

"During the design of the remedy, the potential for re-injection of the treated groundwater in lieu of surface discharge may be evaluated. Re-injection would only be considered if (a) the currently anticipated permeability limitations can be overcome, and (b) there is value with respect to recharging the groundwater."

As you can surmise, my intent with this insert is threefold: First, to put "on the record" that re-injection may be considered during design, which would hopefully minimize any delays in implementing the remedy. Second, to emphasize the challenges to implementation or re-injection, which would allow us to continue to rate Alt 2 higher than Alt 3. Third, by keeping surface discharge as the intended component of Alt 2, it would allow us to defer any further details about re-injection until design; to do so now would be pretty speculative.

We will indeed discuss the implementability challenges to Alt 3 in further detail in the EE/CA report, as you suggest below.

Please let us know what you think.

Thanks,
Dave

-----Original Message-----

From: Lichens.Christopher@epamail.epa.gov
[mailto:Lichens.Christopher@epamail.epa.gov]
Sent: Thursday, July 07, 2005 6:14 PM
To: cmclaugh@demaximis.com; Chamberlin, David
Cc: Schauffler.Frederick@epamail.epa.gov; tom.perina@ch2m.com
Subject: EE/CA Alternative 2 treated water

Chuck and Dave,

As we discussed this morning, EPA's preference for disposition of treated water under Alternative 2 is surface discharge (i.e., storm drain or sewer) but EPA will accept an option for reinjection within that alternative. If a reinjection option is added, the EE/CA should describe the process for determining the selected option and provide additional detail regarding where and how reinjection could occur.

Note that reinjection would likely reduce the implementability of Alternative 2 and its overall rating relative to the other alternatives. The added implementability issues should be described in the evaluation of Alternative 2 and the comparative analysis. As we previously

discussed, the EE/CA should also describe how construction of the trench in Alternative 3 would impact use of the property. If a trench would be considered for reinjection within Alternative 2, a similar discussion should be included.

I'm available Monday, Tuesday afternoon, and Wednesday if you want to talk more about this.

Chris